

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ICONTROL NETWORKS, INC., a Delaware
corporation,

Plaintiff,

v.

ZONOFF, INC., a Delaware corporation,

Defendant.

CASE NO.: 1:15-cv-01109-GMS

JURY TRIAL DEMANDED

**DECLARATION OF JAMES C. YOON IN SUPPORT OF ICONTROL'S OPPOSITION
TO ZONOFF'S MOTION TO DISMISS AND FOR A MORE DEFINITE STATEMENT**

I, James C. Yoon, hereby declare that:

1. I am an attorney at Wilson Sonsini Goodrich & Rosati, counsel for Plaintiff Icontrol Networks, Inc. ("Icontrol") in the above-referenced consolidated actions. I submit this declaration in support of Icontrol's Opposition to Zonoff's Motion to Dismiss and for a More Definite Statement. The matters set forth herein are based upon my personal knowledge, and, if called as a witness, I could and would competently testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of an e-mail exchange between myself and Thomas Kenworthy, counsel for Zonoff, dated February 9 through February 10, 2016.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on February 16, 2016, at Palo Alto, California.



James C. Yoon

YOON DECLARATION

EXHIBIT 1

-----Original Message-----

From: Kenworthy, Thomas B. [<mailto:tkenworthy@morganlewis.com>]

Sent: Wednesday, February 10, 2016 7:42 AM

To: Yoon, James

Cc: Procaccio-Flowers, Mary; Mary B. Matterer; Connolly, Colm F.; Barillare, Jody C.; Davis, Kenneth J.; Gorman, John V.; Goldemberg, Julie S.

Subject: Second Zonoff Case

Jim:

This discussion is not practicable until after the pleadings are closed, and as to when the asserted claims must be identified, it is Zonoff's position, as reflected in the pending motion to dismiss and for a more definite statement, that Icontrol was obliged to do so in its complaint. Icontrol's response to that motion is due next Monday.

Best regards,

Tom

Thomas B. Kenworthy

Morgan, Lewis & Bockius LLP

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Assistant: Beverly Ann Stevenson | +1.215.963.5703 | bstevenson@morganlewis.com

-----Original Message-----

From: Yoon, James [<mailto:JYoon@wsgr.com>]

Sent: Tuesday, February 09, 2016 11:58 AM

To: Kenworthy, Thomas B.

Cc: Procaccio-Flowers, Mary

Subject: Second Zonoff Case

Tom,

Hope all is well.

We would like to discuss the timing of the 15-1109 case, including a schedule for Icontrol's identification of asserted claims and the exchange of contentions.

We believe it will be useful to resolve this issue now, rather than burden the Court with this discussion later in the case.

Let's talk this week.

Talk to you soon,

Jim

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